



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.

Since 1926

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June 12, 2008

Re: Comments on Crime Control License Requirements

Docket No: 0802229350-8434-01

BIS-2008-0005-0001

Dear Bureau of Industry and Security:

The Sporting Arms and Ammunition Manufacturers' Institute, Inc. (SAAMI) is an association of the nation's leading manufacturers of firearms, ammunition and components. SAAMI was founded in 1926 at the request of the federal government to serve the mutual interests of the U.S. sporting firearms and ammunition industry, with emphasis on activities to ensure safe use of their products by sportsmen and others having a lawful use for them.

SAAMI and its member companies would like to offer comments to the Bureau of Industry and Security (BIS) concerning the addition or removal of items to the crime control license requirements. There are three potential changes that SAAMI recommends.

I. Firearms Training Software

SAAMI would first recommend against restrictions on firearms specifications, training videos and software, and detailed specifications, for example materials prepared for armorers. These materials are already part of the public domain and it would be virtually impossible to limit the distribution of firearms training software which is readily available. Areas of underlying concern would be:

- a) Firearms training software used by manufacturers to train armorers.
- b) Training videos and schematic drawings used for training.
- c) Software containing firearm training and function linked to member websites.

II. Commodity Classification

Minor Component Shotgun Parts:

In 2007, a SAAMI member received a letter exempting minor component shotgun parts as EAR99 that can be shipped NLR (no license required). In order for the exporting community to have a better understanding of the regulations, this information should be included in the Commerce Control List.

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Major Component Parts - Value Exemption Needed:

An exemption should be granted based on Major Component Value for items such as barrels, receivers, and choke tubes. This exemption would allow export of a small quantity of major components to facilitate repair (warranty or otherwise) and eliminate the need to screen and investigate such minor shipments in the licensing process.